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February 14, 2024

Hon. Robert W. Lehrburger
Magistrate Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

**Re: *Microbot Medical, Inc. v. Joseph Mona*, 19 Cv. 3782 (GBD) (RWL)
Request For Pre-Motion Conference For Compulsion Of Compliance
With Judgment Debtor Discovery Requests**

Your Honor:

I am one of plaintiff's counsel and I write to request a pre-motion conference, the proposed motion being one to compel compliance with judgment debtor discovery requests in the above-captioned matter and by his son, Marcus, who has acted on the judgment-debtor's behalf throughout this suit and prior thereto in creating the violations giving rise to it.

In November of 2023, my colleague, Miriam Tauber, acting on behalf of the plaintiff, served information subpoenas on Joseph Mona and his son, Marcus, requiring production of documents, and testimonial subpoenas requiring their appearances for oral depositions, all intended to identify assets subject to garnishment, turnover and application to satisfaction of the outstanding judgment.

The subpoenas have not been complied with to any extent whatsoever. Discussions with the Monas' attorney for the purpose of obtaining compliance have not been fruitful.

On behalf of the plaintiff I intend to move for compulsion and ask that a conference be scheduled to discuss the motion and, perhaps, its avoidance through compliance with outstanding requests.

Very truly yours,

David Lopez

DL/el

Cc: All counsel of record via ECF